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March 11, 2022

BY ELECTRONIC FILING

The Honorable Mary Kay Vyskocil  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2230  
New York, NY 10007

Re: *Broidy et al. v. Global Risk Advisors et al.*, 19-cv-11861

Dear Judge Vyskocil:

Pursuant to Section 2(G) of this Court's Individual Rules of Practice in Civil Cases, Defendants respectfully request an extension of time to respond to Plaintiffs' Second Amended Complaint ("SAC") filed on March 1, 2022. *See* Dkt. 116.

Defendants' response to the SAC is currently due March 15. *See* Fed. R. Civ. P. 15(a)(3). Defendants currently intend to move to dismiss the SAC and are preparing to file a pre-motion letter as required by Section 4(A)(i) of this Court's Rules. In view of the length and complexity of Plaintiffs' SAC, which asserts ten different causes of action against ten different Defendants, each of which has multiple grounds to seek dismissal, Defendants respectfully request a two-week extension of time to respond to the SAC to March 29.

This is Defendants' first request for an extension of time to respond to the SAC. Plaintiffs have consented to Defendants' request, and the parties have further agreed to a briefing schedule for Defendants' anticipated motion to dismiss, whereby Defendants' opening brief would be due at a date determined by the Court; Plaintiffs' opposition would be due four weeks later; and Defendants' reply would be due two weeks after that.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Orin Snyder

Orin Snyder

cc: All Counsel of Record via ECF